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March 19, 2012

Doug Dean, Executive Director
Colorado Public Utilities Commission
1560 Broadway, Ste. 250
Denver, CO 80202

RE: Long Distance Call Termination Issues

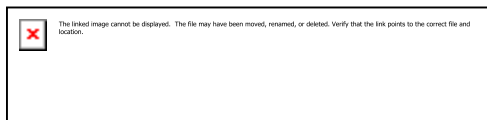
Dear Mr. Dean;

Please find enclosed a letter from a customer of mine that had a particularly unique and unsettling experience with the apparent failure of long distance carriers to terminate calls into rural areas. This issue highlights the public safety ramifications of this problem. Fortunately, no life was lost as a result of this failure of the network, but it could only be a matter of time.

I'm aware that the industry is working on this problem and the FCC has taken a stance, but the problem persists and attempted calling from the Denver area into my system seem to dominate the customer complaints I am receiving.

I ask that you share this with Chairman Epel and interested parties in the Commission and hope that this information will aid in the Commission's efforts to help resolve this issue.

Sincerely,



Richard J. Sellers
General Manager

Attachment: Memo from Steve Douglas dated 3/9/2012

Cc: Carol Brennan, NECA

TO: Mr. Dick Sellers, Pine Drive Telephone Company
FROM: Steve [REDACTED]
DATE: March 9, 2012
SUBJECT: Dropped long-distance calls - March 4, 2012

For the record, I live at [REDACTED], Beulah, Colorado. My home telephone number is [REDACTED]. I have been a Pine Drive Telephone Company customer for over 20 years and have always felt well served by your company. In the company's February and March, 2012 newsletters we have been made aware of a current problem related to termination of long-distance calls coming into Pine Drive's service area, i.e., calls being terminated before they ring to the intended telephone. The result leaves the caller with the impression that no one was picking up the phone and that the call was not going to voice-mail, and the intended recipient of that call was unaware of the effort because their phone did not ring.

I had an experience last Sunday (March 4, 2012) that appears to be the result of that long-distance call termination problem. I will describe that situation here in the hope that you can use the information to get the problem resolved, and I will do that because the impact of the situation goes well beyond me personally. It has public safety and potential life saving implications that should be taken seriously. It is my understanding that the problem is not with Pine Drive Telephone's equipment or process, but instead is related to other telephone service providers routing calls to numbers served by Pine Drive. If this is the case, the solution may require the attention of the Colorado Public Utilities Commission and/or the Federal Communications Commission.

I am one of nine search and rescue coordinators currently volunteering for the Colorado Search and Rescue Board. The Colorado Search and Rescue Board is a Colorado non-profit 501(c)(3) corporation that provides a point of contact for search and rescue matters on a state level. The board works closely with the State Division of Emergency Management (DEM) to fulfill several of DEM's statutory responsibilities regarding search and rescue.

The CSRB maintains a roster of search and rescue (SAR) resources throughout Colorado, and provides a Colorado Search and Rescue Coordinator, who is available 24/7 to assist local authorities in locating, and using additional or specialized resources. More information about CSRB can be obtained at its website, i.e., <http://www.coloradosarboard.org/>.

I am the coordinator on call this week, and was working on a search mission last Sunday, March 4, 2012. A man from the area of Norwood, Colorado was caught in an avalanche Saturday, while snowmobiling in the La Sal Mountains of eastern Utah. Search teams were attempting to locate and recover him, and contacted Colorado for assistance. Specifically, they were asking for an avalanche SAR dog team to assist in the process. Please understand that by Sunday, the mission was viewed more as a recovery than a rescue operation. Still, the dog team resources were being requested to speed up the process, both with victim care and responder safety in mind. (There were 50 searchers working to find him in the avalanche area.)

I was contacted at 11:16 am Sunday to assist in locating SAR resources to help on this mission. We rely heavily on land-line and cellular telephones to provide that assistance. Because of service at my residence, I rely on my cell phone ([REDACTED]) for initial notification from our 24-hour answering service, and then on my land-line ([REDACTED]) to place and receive calls. Those calls are typically within Colorado, except those involving the Air Force Rescue Coordination Center in Florida, which is instrumental in providing federal aircraft for SAR missions. There are approximately 60 SAR teams in Colorado and they are mostly organized geographically at the county level. Only a portion of those teams have their own SAR dog resources and only a portion of those dog resources are trained and certified for avalanche work. A big part of a CSRB coordinator's job is to find available and appropriate resources, brief them on the mission and assist them (if needed) in getting to the incident ... all in a timely manner. To do that, we network a lot. Search and Rescue Dogs of Colorado (SARDOC) is a group we depend on for finding available and appropriate dog resources.

I called SARDOC's answering service at 11:44 am Sunday and asked that their coordinator on call contact me regarding the need for an avalanche SAR dog team. I asked to be called back at my home phone. I continued to work the mission, calling various other SAR teams directly. At 12:21 I learned that Utah had cancelled their request for assistance from Colorado. (They recovered the missing gentleman about an hour later, buried under 12 feet of snow.) I proceeded to contact various teams that I had been speaking with, to let them know that our services were no longer needed. I contacted SARDOC's answering service with that update, although I had not heard from their coordinator, which was unusual. I made reference to that in my mission report, which was passed on to SARDOC. I was notified March 6th that, in fact, the SARDOC coordinator (Ms. Amy Ho) had tried unsuccessfully for over two hours Sunday to return my call.

I spoke with Ms. Ho yesterday about what did and did not happen Sunday. She indicated that she received a page to call me at 11:44 am and began attempting to return my call a couple of minutes later. She called me at [REDACTED] every 10-15 minutes for the next two or more hours. Each time, the phone rang for over a minute and then the call was terminated. She did not get a busy signal nor was she routed to my voice-mail. She placed calls to me using both her cell phone ([REDACTED]) and home phone ([REDACTED]). Those calls were placed from Longmont, Colorado. I was completely unaware of her attempts to call me Sunday, but I have no doubt that those attempts were made.

My experience with long-distance calls apparently being dropped before they got to my home phone Sunday did not influence the outcome of this SAR mission. Still, there is no guarantee that the next instance of calls being dropped will not hinder a mission, either in terms of the safety of the victim or the search and rescue personnel attempting to rescue or recover that victim. From what I understand, that issue is not limited to me and my phone service from Pine Drive Telephone; rather, it has the potential to impact any SAR coordinator or SAR team in rural Colorado that depends on service from a small telephone service provider. That is not a criticism of small companies, because they often provide the best or only available service. My experience with Pine Drive Telephone Company has been excellent, on all levels. I do ask for your assistance in getting this apparent problem resolved. Thank you.